



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2598

DATE SCANNED 5-29-13

SCANNER NO. 2

SCAN OPERATOR cmH

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2012 NOV 30 PM 3: 20

November 30, 2012

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: *JW* Jodi Winship/Sari Pickerall *SP*  
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2012 October Quarterly Report (Non-Election Sensitive) for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2012 October Quarterly Report in accordance with 2 U.S.C. 434(a). The 2012 October Quarterly Report was due on October 15, 2012.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 CFR 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

**Recommendation**

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

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Federal Election Commission  
Reason to Believe Circulation Report  
2012 OCTOBER QUARTERLY Not Election Sensitive 10/15/2012 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2573	C00516468	BENNETT FOR SENATE COMMITTEE	BENNETT, RICHARD A	JOSHUA A. TARDY	\$439,695	0	10/31/2012	16	\$6,000	\$135
2574	C00519686	BRUCE PELLER FOR CONGRESS	PELLER, BRUCE G	PAULA ANDREA HENAO	\$106,430	0		Not Filed	\$35,477 (est)	\$980
2575	C00493742	BYRON GEORGIOU FOR SENATE	GEORGIOU, BYRON	MATTHEW DICKSON	\$3,490,251	0		Not Filed	\$581,709 (est)	\$11,000
2576	C00508705	COMMITTEE TO ELECT ERNIE BELTZ JR FOR US CONGRESS	BELTZ, ERNIE ALAN JR	NATHAN CHRISTOPHER	\$151,759	0		Not Filed	\$50,586 (est)	\$2,970
2577	C00504266	CONNECTICUT FOR PETER LUMAJ	LUMAJ, PJERIN (PETER)	ANTON RUKAJ	\$527,867	0		Not Filed	\$131,967 (est)	\$4,950
2578	C00506741	DAN HUGHES FOR SENATE	HUGHES, DANIEL J	MICHELLE D. MOONS	\$657,158	0		Not Filed	\$164,290 (est)	\$6,050
2579	C00509471	DAN LILJENQUIST FOR US SENATE	LILJENQUIST, DAN	MICHAEL MCCAULEY	\$1,689,395	0	10/22/2012	7	\$65,867	\$907
2580	C00458422	DR NOREN FOR US SENATE	NOREN, SCOTT ANDREW	RICHARD PARKER	\$103,717	0	11/8/2012	24	\$16,078	\$230
2581	C00504845	ELECT CLARK HALL	HALL, CLARK MADISON	P.R. CLATWORTHY	\$826,596	0	10/22/2012	7	\$11,803	\$145
2583	C00255471	HOOSIERS SUPPORTING BUYER FOR CONGRESS	BUYER, CONGRESSMAN STEVE	STEPHANIE MATTIX	\$103,304	0	11/19/2012	Not Filed	\$15,938	\$550
2584	C00507004	JACKSON EATON FOR CONGRESS	EATON, J JACKSON	JILLIAN E. O'MALLEY	\$367,922	0		Not Filed	\$122,641 (est)	\$4,950
2586	C00507590	KATHLEEN HICKS FOR CONGRESS	HICKS, ERIN KATHLEEN	DR. CAMILLE RODRIGUEZ	\$181,748	0		Not Filed	\$45,437 (est)	\$990
2587	C00501965	KELDA FOR CONGRESS	ROYS, KELDA HELEN	LAURENE BACH	\$842,050	0		Not Filed	\$168,410 (est)	\$6,050
2590	C00503359	MARK OXNER FOR CONGRESS	OXNER, MARK ANTHONY	AMPARO O. OXNER	\$169,903	0		Not Filed	\$42,476 (est)	\$990
2592	C00517102	Q. BYRUM HURST FOR CONGRESS	HURST, Q. BYRUM JR	QUINCY B. HURST, III	\$622,264	0		Not Filed	\$155,566 (est)	\$6,050
2593	C00499046	RICH BECKER FOR CONGRESS	BECKER, RICHARD H	JOHN B. MCBRIDE	\$862,207	0		Not Filed	\$51,853	\$2,970
2594	C00468652	RUDY MOISE FOR CONGRESS	MOISE, RUDOLPH	MIRJAM MOISE	\$864,648	0		Not Filed	\$123,521 (est)	\$4,950

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2595	C00508620	SALOMON TORRES FOR CONGRESS	TORRES, SALOMON	JUAN E. RIVERA, CPA	\$161,597	0	11/1/2012	17	\$4,097	\$110
2597	C00518027	STEVE SALAZAR FOR CONGRESS	SALAZAR, STEVE	ROSARIO RODRIGUEZ	\$221,423	1		Not Filed	\$110,712 (est)	\$6,187
2598	C00497222	SUSAN ADAMS FOR CONGRESS	ADAMS, SUSAN L	TAMARA S. HILL	\$404,348	0		Not Filed	\$67,391 (est)	\$2,970
2600	C00494773	TERRY WHITE FOR INDIANA	WHITE, TERRY A	TERRY A. WHITE	\$310,727	0		Not Filed	\$62,145 (est)	\$2,970
2601	C00508596	TEXANS FOR KY GRIFFIN	GRIFFIN, KY DOUGLAS	RHONDA GRIFFIN	\$140,452	0	11/5/2012	21	\$13,131	\$215
2603	C00497404	WENONA FOR ARIZONA	BALDENEGRO, WENONA RAF RENAIIV	SAL RAI DENEGRO	\$231,159	0	11/1/2012	17	\$28,643	\$540

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Reason To Believe Recommendation - 2012 )  
October Quarterly Report (Non-Election )  
Sensitive) for the Administrative Fine )  
Program: )

BENNETT FOR SENATE COMMITTEE, ) AF# 2573  
and JOSHUA A TARDY as treasurer; )  
BRUCE PELLER FOR CONGRESS, and ) AF# 2574  
PAULA ANDREA HENAO as treasurer; )  
BYRON GEORGIU FOR SENATE, and ) AF# 2575  
MATTHEW DICKSON as treasurer; )  
COMMITTEE TO ELECT ERNIE BELTZ ) AF# 2576  
JR FOR US CONGRESS, and NATHAN )  
CHRISTOPHER as treasurer; )  
CONNECTICUT FOR PETER LUMAJ, ) AF# 2577  
and ANTON RUKAJ as treasurer; )  
DAN HUGHES FOR SENATE, and ) AF# 2578  
MICHELLE D MOONS as treasurer; )  
DAN LILJENQUIST FOR US SENATE, ) AF# 2579  
and MIKE MCCAULEY as treasurer; )  
DR NOREN FOR US SENATE, and ) AF# 2580  
RICHARD PARKER as treasurer; )  
ELECT CLARK HALL, and ) AF# 2581  
CLATWORTHY, P.R. as treasurer; )

HOOSIERS SUPPORTING BUYER FOR ) AF# 2583  
CONGRESS, and MATTIX, STEPHANIE )  
as treasurer; )  
JACKSON EATON FOR CONGRESS, and ) AF# 2584  
JILLIAN E O'MALLEY as treasurer; )

KATHLEEN HICKS FOR CONGRESS, ) AF# 2586  
and DR CAMILLE RODRIGUEZ as )  
treasurer; )  
KELDA FOR CONGRESS, and ) AF# 2587  
LAURENE BACH as treasurer; )

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Federal Election Commission  
Certification for Administrative Fines  
December 04, 2012

Page 2

MARK OXNER FOR CONGRESS, and ) AF# 2590  
AMPARO O OXNER as treasurer; )

Q. BYRUM HURST FOR CONGRESS, ) AF# 2592  
and HURST, QUINCY B. III as treasurer; )  
RICH BECKER FOR CONGRESS, and ) AF# 2593  
MCBRIDE, JOHN B as treasurer; )  
RUDY MOISE FOR CONGRESS, and ) AF# 2594  
MOISE, MIRJAM as treasurer; )  
SALOMON TORRES FOR CONGRESS, ) AF# 2595  
and JUAN E RIVERA CPA as treasurer; )

STEVE SALAZAR FOR CONGRESS, and ) AF# 2597  
ROSARIO RODRIGUEZ as treasurer; )  
SUSAN ADAMS FOR CONGRESS, and ) AF# 2598  
TAMARA S HULL as treasurer; )

TERRY WHITE FOR INDIANA, and ) AF# 2600  
TERRY A WHITE as treasurer; )  
TEXANS FOR KY GRIFFIN, and ) AF# 2601  
RHONDA GRIFFIN as treasurer; )

WENONA FOR ARIZONA, and ) AF# 2603  
BAIDENEGRO, SAL as treasurer; )

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CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on December 04, 2012 the Commission took the following actions on the Reason To Believe Recommendation - 2012 October Quarterly Report (Non-Election Sensitive) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated November 30, 2012, on the following committees:

AF#2573 Decided by a vote of 6-0 to: (1) find reason to believe that BENNETT FOR SENATE COMMITTEE, and JOSHUA A TARDY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2574 Decided by a vote of 6-0 to: (1) find reason to believe that BRUCE PELLER FOR CONGRESS, and PAULA ANDREA HENAO as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2575 Decided by a vote of 6-0 to: (1) find reason to believe that BYRON GEORGIU FOR SENATE, and MATTHEW DICKSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2576 Decided by a vote of 6-0 to: (1) find reason to believe that COMMITTEE TO ELECT ERNIE BELTZ JR FOR US CONGRESS, and NATHAN CHRISTOPHER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2577 Decided by a vote of 6-0 to: (1) find reason to believe that CONNECTICUT FOR PETER LUMAJ, and ANTON RUKAJ as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2578 Decided by a vote of 6-0 to: (1) find reason to believe that DAN HUGHES FOR SENATE, and MICHELLE D MOONS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2579 Decided by a vote of 6-0 to: (1) find reason to believe that DAN LILJENQUIST FOR US SENATE, and MIKE MCCAULEY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2580 Decided by a vote of 6-0 to: (1) find reason to believe that DR NOREN FOR US SENATE, and RICHARD PARKER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2581 Decided by a vote of 6-0 to: (1) find reason to believe that ELECT CLARK HALL, and CLATWORTHY, P.R. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2583 Decided by a vote of 6-0 to: (1) find reason to believe that HOOSIERS SUPPORTING BUYER FOR CONGRESS, and MATTIX, STEPHANIE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2584 Decided by a vote of 6-0 to: (1) find reason to believe that JACKSON EATON FOR CONGRESS, and JILLIAN E O'MALLEY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2586 Decided by a vote of 6-0 to: (1) find reason to believe that KATHLEEN HICKS FOR CONGRESS, and DR CAMILLE RODRIGUEZ as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2587 Decided by a vote of 6-0 to: (1) find reason to believe that KELDA FOR CONGRESS, and LAURENE BACH as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2590 Decided by a vote of 6-0 to: (1) find reason to believe that MARK OXNER FOR CONGRESS, and AMPARO O OXNER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2592 Decided by a vote of 6-0 to: (1) find reason to believe that Q. BYRUM HURST FOR CONGRESS, and HURST, QUINCY B. III as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2593 Decided by a vote of 6-0 to: (1) find reason to believe that RICH BECKER FOR CONGRESS, and MCBRIDE, JOHN B as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2594 Decided by a vote of 6-0 to: (1) find reason to believe that RUDY MOISE FOR CONGRESS, and MOISE, MIRJAM as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2595 Decided by a vote of 6-0 to: (1) find reason to believe that SALOMON TORRES FOR CONGRESS, and JUAN E RIVERA CPA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2597 Decided by a vote of 6-0 to: (1) find reason to believe that STEVE SALAZAR FOR CONGRESS, and ROSARIO RODRIGUEZ as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2598 Decided by a vote of 6-0 to: (1) find reason to believe that SUSAN ADAMS FOR CONGRESS, and TAMARA S HULL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2600 Decided by a vote of 6-0 to: (1) find reason to believe that TERRY WHITE FOR INDIANA, and TERRY A WHITE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2601 Decided by a vote of 6-0 to: (1) find reason to believe that TEXANS FOR KY GRIFFIN, and RHONDA GRIFFIN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2603 Decided by a vote of 6-0 to: (1) find reason to believe that WENONA FOR ARIZONA, and BALDENEGRO, SAL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount

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indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

December 4, 2012  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 5, 2012

Tamara S. Hull, in official capacity as Treasurer  
Susan Adams for Congress  
68 Mitchell Blvd., Suite 250  
San Rafael, CA 94903

C00497222  
AF#: 2598

Dear Ms. Hull:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an October Quarterly Report of Receipts and Disbursements every calendar year. This report, covering the period through September 30, 2012, shall be filed no later than October 15, 2012. 2 U.S.C. 434(a). Records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. § 434(a). 2 U.S.C. § 437g(a)(4). On December 4, 2012, the FEC found that there is reason to believe ("RTB") that Susan Adams for Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) by failing to file timely this report on or before October 15, 2012. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$2,970. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$2,970 is due within forty (40) days of the finding, or by January 13, 2013, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$67,391  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

**1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street,

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NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or January 13, 2013. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Susan Adams for Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1992 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

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**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 CFR § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

*Carole C. Hunter*

Caroline C. Hunter  
Chair

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**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$2,970 for the 2012 October Quarterly Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The remittance and your payment are due by January 13, 2013. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**  
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FOR: Susan Adams for Congress

FEC ID#: C00497222

AF#: 2598

PAYMENT DUE DATE: January 13, 2013

PAYMENT AMOUNT DUE: \$2,970

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**FEC OFFICE OF  
ADMIN REVIEW**  
**Susan Adams for Congress**

2013 JAN 14 PM 2:58

c/o Tamara S. Hull, CPA, Treasurer  
68 Mitchell Blvd., Suite 240  
San Rafael, California 94903  
(415) 472-4225

January 11, 2013

Federal Election Commission  
Office of Administrative Review  
999 E Street NW  
Washington, D.C. 20463

*Via FedEx*

Re: FEC #C00497222, Susan Adams for Congress  
AF #2598

Dear Office of Administrative Review,

I was the treasurer for the Susan Adams for Congress campaign.

I am writing in response to your letter dated December 5, 2012, where you believe that we owe you a civil penalty of \$2,970 for not filing a report for the quarter ended September 30, 2012. A copy of your letter is enclosed for your reference.

After reviewing our June 30, 2012 report, and realizing that it mistakenly did not have the "Termination Report" box checked, like I thought I'd done, I can understand why you think we owe you a report.

However, I believe there has been a miscalculation of the calculated civil money penalty.

Other than an erroneous \$25 automatic monthly contribution on July 2, that we refunded, we collected no money after June 30. Thus, I am particularly concerned that your letter states that you have determined that our "Level of Activity" was \$67,391 for the quarter ended September 30, 2012 and that the civil penalty is based on this "Level of Activity".

13092683895

Federal Election Commission  
Office of Administrative Review  
January 11, 2013  
Page Two

Re: FEC #C00497222, Susan Adams for Congress  
AF #2598

If we need to file a report for September 30 showing the \$25 collected and refunded, along with the payment of the \$206.37 we had in Cash on Hand at June 30 to the candidate as partial payment for the Debts and Obligations of \$735.98 we reported at June 30, I am happy to do so.

For the record, the campaign is closed. The bank account would be closed if one donor would cash their June 2012 refund check for their \$50 Primary contribution.

Also, we closed our NGP-VAN account, so I will need help with the FECfile program if we need to file additional reports.

I was an unpaid volunteer, and would personally have to pay any penalties out of my own meager funds.

I hope that all of these factors will be taken into consideration in your determination.

Thank you for your assistance in this matter. Please contact me if you have any questions or need any additional information.

Sincerely,

*Tamara S. Hull, CPA*

Tamara S. Hull, CPA  
Treasurer

13092683896



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Via First Class Mail

January 14, 2013

Tamara S. Hull, in official capacity as Treasurer  
Susan Adams for Congress  
68 Mitchell Blvd., Suite 240  
San Rafael, CA 94903

C00497222  
AF#: 2598

Dear Ms. Hull:

On January 14, 2013, the Commission received your written response ("challenge") which is being reviewed by the Office of Administrative Review. If you have any questions regarding your challenge, please contact this Office on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

*Rhiannon Magruder*

Rhiannon Magruder  
Acting Reviewing Officer  
Office of Administrative Review

13092683897

**Date: January 15, 2013**

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW  
CHALLENGE RECEIVED**

**AF#: 2598**

**Committee Name: Susan Adams for Congress**

**Committee ID#: C00497222**

**Committee Address (if different than in RTB letter): N/A**

**Treasurer Name (if different than in RTB finding): N/A**

**Attachments:**

**Copy of RTB Circulation Report, dated November 30, 2012 and RTB Certification, dated December 4, 2012 (Y/N): Previously Forwarded**

**Attachment #: N/A**

**Proof of Delivery (to be forwarded at later date if not yet received) (Y/N): Y**

**Attachment #: 1**

**Other Relevant Telecoms (Y/N): N**

**Attachment #: N/A**

**Original Correspondence Received by RAD in Response to RTB Letter (Y/N): N**

**Attachment #: N/A**

**RAD Staff Declaration (Y/N): Y**

**-2012 October Quarterly Report Notice, dated September 21, 2012.**

**-Non-Filer Letter, dated October 31, 2012.**

**-RTB Letter, dated December 5, 2012.**

**Attachment #: 3**

**Other RAD Information: (Y/N): N**

**Attachment#: N/A**

13092683898

**Delivery Notification**

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

**Tracking Number:** 1Z WF5 860 A2 9158 234 5  
**Reference Number(s):** RAD, 2598  
**Service:** NEXT DAY AIR  
**Special Instructions:** ADULT SIGNATURE REQUIRED  
**Shipped/Billed On:** 12/05/2012  
**Delivered On:** 12/06/2012 9:33 A.M.  
**Delivered To:** 68 MITCHELL BLVD  
250  
SAN RAFAEL, CA, US 94903

**Signed By:** CASTROS  
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**Location:** RECEPTION

Thank you for giving us this opportunity to serve you.

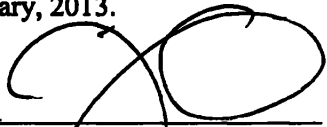
Sincerely,  
UPS

Tracking results provided by UPS: 12/10/2012 3:32 P.M. ET

13092683899

## DECLARATION OF JODI WINSHIP

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Susan Adams for Congress:
  - A) Report Notice, dated September 21, 2012, referencing the 2012 October Quarterly Report (sent via electronic mail to: tamarahull@yahoo.com);
  - B) Non-Filer Letter, dated October 31, 2012, referencing the 2012 October Quarterly Report;
  - C) Reason-to-Believe Letter, dated December 5, 2012 referencing the 2012 October Quarterly Report.
3. I hereby certify that I have searched the Commission's public records and find that Susan Adams for Congress has not yet filed the 2012 October Quarterly Report with the Commission.
4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 15<sup>th</sup> day of January, 2013.

  
\_\_\_\_\_  
Jodi Winship  
Chief, Compliance Branch  
Reports Analysis Division  
Federal Election Commission



# OCTOBER QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL COMMITTEES  
PARTIES AND PACS

September 21, 2012

## CURRENT REPORT DUE

REPORT	CLOSE OF BOOKS	REG./CERT. & OVERNIGHT MAILING DEADLINE	FILING DEADLINE
October Quarterly	09/30/12	10/15/12	10/15/12

## REPORTING SCHEDULE FOR REMAINDER OF 2012

REPORT	CLOSE OF BOOKS	REG./CERT. & OVERNIGHT MAILING DEADLINE	FILING DEADLINE
Pre-General <sup>2</sup>	10/17/12	10/22/12	10/25/12
Post-General	11/26/12	12/06/12	12/06/12
Year-End	12/31/12	01/31/13	01/31/13

Supplemental Filing Information is available:

- Congressional Committees
- Parties and PACs

<sup>1</sup> A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered up through the close of books for the first report due.

<sup>2</sup> **Parties and PACs:** required only if committee makes contributions or expenditures in connection with the general election during the reporting period. 11 CFR 104.5(c)(1)(ii).

**Congressional Committees:** the principal campaign committee of a candidate who participates in the general election must file pre-and post-general election reports. 11 CFR 104.5(a)(2).

## 2012 SUPPLEMENTAL FILING INFORMATION CONGRESSIONAL COMMITTEES

**PLEASE NOTE:** The Commission provides reminders of upcoming filing dates as a courtesy to help committees comply with the filing deadlines set forth in the Act and Commission regulations. Committee treasurers must comply with all applicable filing deadlines established by law, and the lack of prior notice does not constitute an excuse for failing to comply with any filing deadline.

### WHO MUST FILE

Principal campaign committees of congressional candidates <sup>1</sup> (including unopposed candidates and candidates whose names do not appear on the ballot) must file Quarterly Reports in 2012. <sup>2</sup>

Campaigns that raise or spend more than \$5,000 for the 2012 election cycle (and thus trigger registration and reporting requirements) must file quarterly reports throughout 2012, even if the candidate plans to retire, withdraws from the race prior to the primary election, loses the primary or drops out of the race prior to the general election. See 11 CFR 104.5(a)(2).

Before a committee can stop filing with the FEC, it must file a termination report with the Commission. See 11 CFR 102.3. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

### METHODS OF FILING REPORTS

#### Electronic Filing

Reports filed electronically must be received and validated by the Commission by 11:59 p.m. Eastern Time on the filing deadline. See 11 CFR 104.5(e). See also 11 CFR 104.18 and 100.19.

- Web Page: Electronic Filing Page
- Campaign Guide for Congressional Candidates and Committees (Candidate Guide), pp. 83-86 [PDF]

#### Paper Filing - Meeting the Filing Deadline

Paper Report filing options -- Registered, Certified or Overnight or First Class Mail.

See 11 CFR 104.5(e). See also 11 CFR 100.19.

- Web Page: Link to Paper Forms (for downloading and printing)
- Candidate Guide, p. 82 [PDF]

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<sup>1</sup> Generally, an individual becomes a candidate for federal office (and thus triggers registration and reporting obligations) when his or her campaign exceeds \$5,000 in either contributions or expenditures. If the campaign has not crossed the \$5,000 threshold, it is not required to file reports. See 11 CFR 100.3(a). See also 11 CFR 104.5(a).

<sup>2</sup> If a candidate has more than one authorized committee, the principal campaign committee files a consolidated report on Form 3Z [PDF]. See 11 CFR 104.3(f).



## PRE- AND POST-ELECTION REPORTS

The principal campaign committee of any candidate participating in a 2012 state primary, nominating convention or runoff election -- even if unopposed -- must also file a pre-election report 12 days prior to the primary, nominating convention or runoff. The principal campaign committee of a candidate who participates in the general election must file pre- and post-general election reports. See 11 CFR 104.5(a)(2).

- Web Page: 2012 Congressional Pre-Primary Reporting Dates
- The Record:
  - FEC Record Blog: Reporting
  - January 2012 issue [PDF]
- Candidate Guide, pp. 81-82 [PDF]

## 48 HOUR NOTICES OF CONTRIBUTIONS

The principal campaign committee must file notices if any authorized committees receive any contribution (including in-kind gifts or advances of goods or services; loans from the candidate or other non-bank sources; and guarantees or endorsements of bank loans to the candidate or committee) of \$1,000 or more per source, during the period less than 20 days but more than 48 hours before any election in which the candidate is running. See 11 CFR 104.5(f).

The notices must reach the appropriate federal filing office within 48 hours of the committee's receipt of the contribution(s). Campaign committees that file electronically **MUST** submit their 48-hour notices electronically. See 11 CFR 104.5(f).

- Web Page: Electronic Filing Page
- Web Page: Link to Paper Forms (for downloading and printing)
- Web Page: Link to Web Form 6 (for online submission)
- Form 6 Fax numbers
  - Senate campaigns (Secretary of the Senate): (202) 224-1851
  - House Campaigns (FEC): (202) 219-0174
- Campaign Guide: Candidate Guide, p. 81 [PDF]

## 2012 REPORTING SCHEDULE

- Web Page: 2012 Reporting Dates Page
- The Record:
  - FEC Record Blog: Reporting
  - January 2012 issue [PDF]
- Candidate Guide, p. 83 [PDF]

## COMPLIANCE

### Treasurer Responsibility

Committee Treasurers are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time. See 11 CFR 104.14(d).

- Statement of Policy Regarding Treasurers Subject to Enforcement Proceedings [PDF]
- Candidate Guide, p. 7-9 [PDF]

### Administrative Fine Program

Political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$17,600 (or more for repeat late- and non-filers).<sup>3</sup> See generally, 11 CFR Part 111 Subpart B. See also 11 CFR 111.43.

- Web Page: Administrative Fine Program
- Candidate Guide, pp. 82-83 [PDF]

## DISCLOSURE OF LOBBYIST BUNDLING ACTIVITY

Campaign committees must file FEC Form 3L [PDF] if they receive two or more bundled contributions from lobbyists/registrants or lobbyist/registrant PACs that aggregate in excess of \$16,700 during the applicable reporting period (see page 1 of this notice). See 11 CFR 104.22 and 11 CFR 110.17(f).

- The Record: March 2009 issue [PDF]
- Candidate Guide, Appendix F, pp. 155-161 [PDF]

## IMPORTANT FILING INFORMATION - PAPER FILERS

In response to the 2001 anthrax threat, the U.S. Postal Service is irradiating mail directed to many federal agencies, including the FEC and the Secretary of the Senate.<sup>4</sup> This process has not only delayed mail delivery, it has also damaged and in some cases destroyed pieces of mail. As a result, committees that file reports with the FEC may want to consider submitting their reports by some means other than U.S. mail. Alternative methods include electronic filing, overnight mail or delivery service, and hand delivery.

<sup>3</sup> Penalties for late- or non-filing of 48-hour notices are based on the amount of contributions not timely disclosed. As a result, these penalties may exceed \$17,600, even for first-time violations.

<sup>4</sup> Senate committees should contact the Secretary of the Senate at (202) 224-0322 for more information on filing reports via US mail.

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**FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100**

## 2012 SUPPLEMENTAL FILING INFORMATION PACs AND PARTY COMMITTEES

**PLEASE NOTE:** The Commission provides reminders of upcoming filing dates as a courtesy to help committees comply with the filing deadlines set forth in the Act and Commission regulations. Committee treasurers must comply with all applicable filing deadlines established by law, and the lack of prior notice does not constitute an excuse for failing to comply with any filing deadline.

### WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file either quarterly or monthly reports in 2012. See 11 CFR 104.5(c). Before a committee can stop filing with the FEC, it must file a termination report with the Commission. See 11 CFR 102.3. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

### METHODS OF FILING REPORTS

#### Electronic Filing

Reports filed electronically must be received and validated by the Commission by 11:59 p.m. Eastern Time on the filing deadline. See 11 CFR 104.5(e). See also 11 CFR 104.18 and 100.19.

- Web Page: Electronic Filing Page
- Campaign Guide: Nonconnected Committees (Nonconnected), pp. 51-53 [PDF]; Corporations and Labor Organizations (SSF), pp. 49-51 [PDF]; Political Party Committees (Party), pp. 69-71 [PDF].

#### Paper Filing -- Meeting the Filing Deadline

Paper report filing options -- Registered, Certified or Overnight or First Class Mail. See 11 CFR 104.5(e). See also 11 CFR 100.19.

- Web Page: Link to Paper Forms (for downloading and printing)
- Campaign Guide: Nonconnected, pp. 47-48 [PDF]; SSF, pp. 45-46 [PDF]; Party, p. 65 [PDF].

### CHANGE IN FILING FREQUENCY

Committees able to change their reporting schedule (for example, from monthly to quarterly) who wish to do so must notify the Commission in writing and may change their filing frequency no more than once per calendar year. See 11 CFR 104.5(c).

- Web Page: Filing Frequency by Type of Committee
- Campaign Guide: Nonconnected, p. 51 [PDF]; SSF, p. 49 [PDF]; Party, p. 67 [PDF].

### 2012 REPORTING SCHEDULE

- Web Page: 2012 Reporting Dates Page
- The Record:
  - FEC Record Blog: Reporting
  - January 2012 issue [PDF]
- Campaign Guide: Nonconnected, pp. 49-51 [PDF]; SSF, pp. 46-48 [PDF]; Party, pp. 67-68 [PDF].

## PRE-ELECTION REPORTING

Quarterly filing committees that make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See 11 CFR 104.5(c)(1)(ii).

- Web Page: 2012 Congressional Pre-Primary Reporting Dates Page
- The Record:
  - FEC Record Blog: Reporting
  - January 2012 issue [PDF]
- Campaign Guide: Nonconnected, pp. 49-51 [PDF]; SSF, pp. 46-48 [PDF]; Party, pp. 67-68 [PDF].

## COMPLIANCE

### Treasurer Responsibility

Committee treasurers are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time. See 11 CFR 104.14(d).

- Statement of Policy Regarding Treasurers Subject to Enforcement Proceeding [PDF]
- Campaign Guide: Nonconnected, pp. 3-4 [PDF]; SSF, pp. 1-2 [PDF]; Party, pp. 6-7 [PDF].

### Administrative Fine Program

Failure to file reports on time may be subject to civil money penalties up to \$17,600 (or more for repeat late- or non-filers). See 11 CFR 111.43(b). See generally, 11 CFR Part 111 Subpart B.

See also 11 CFR 111.43.

- Web Page: Administrative Fine Program Page
- Campaign Guide: Nonconnected, pp. 48-49 [PDF]; SSF, p. 46 [PDF]; Party, p. 66 [PDF].

## DISCLOSURE OF LOBBYIST BUNDLING ACTIVITY

Party committees and Leadership PACs must file FEC Form 3L [PDF] if they receive two or more bundled contributions from lobbyists/registrants or lobbyist/registrant PACs that aggregate in excess of \$16,700 during the applicable reporting period (see page 1 of this notice). See 11 CFR 104.22 and 11 CFR 110.17(f).

- The Record: March 2009 issue [PDF]

## 48- AND 24-HOUR REPORTS OF INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in 2012 may have to disclose this activity within 48- or 24-hours based upon the date and amount of the expenditure.

See 11 CFR 104.4(b)(2) and (c). See generally, 11 CFR 104.4.

- Web Page: State-by-state chart of 2012 48- and 24-hour periods for independent expenditures
- Campaign Guide: Nonconnected, pp. 72-74 [PDF]; SSF, pp. 65-67 [PDF]; Party, pp. 87-89 [PDF].

These reports are not required when a PAC or Party Committee makes a contribution directly to a candidate.

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**FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 31, 2012

RQ-7

TAMARA S HULL, TREASURER  
SUSAN ADAMS FOR CONGRESS  
68 MITCHELL BLVD SUITE 250  
SAN RAFAEL, CA 94903

IDENTIFICATION NUMBER: C00497222

REFERENCE: OCTOBER QUARTERLY REPORT 7/1/2012 - 9/30/2012

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended.

It is important that you file this report immediately. The report must be filed with the Federal Election Commission, 999 E Street, N.W., Washington, DC 20463 for House candidates, or the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 (if sent via overnight delivery service) or Senate Office of Public Records, P.O. Box 77578, Washington, DC 20013-7578 (if sent via USPS) for Senate Candidates. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at [www.fec.gov](http://www.fec.gov).

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact SARI PICKERALL in the Reports Analysis Division on our toll free number (800)424-9590. Our local number is (202)694-1130.

Sincerely,

*Debbie Chacona*

Debbie Chacona  
Assistant Staff Director  
Reports Analysis Division (RAD)

11090653907



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2013 FEB 11 PM 4:27

**SENSITIVE**

February 11, 2013

**MEMORANDUM**

To: The Commission

Through: Alec Palmer *ACP*  
Staff Director

From: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Rhiannon Magruder *RM*  
Acting Reviewing Officer  
Office of Administrative Review

Subject: Reviewing Officer Recommendation in AF# 2598 – Susan Adams for  
Congress and Tamara S. Hull, in her official capacity as Treasurer  
(C00497222)

The attached Reviewing Officer Recommendation is being circulated on an informational basis. A copy was also sent to the respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary a written response within 10 days of transmittal of the recommendation.

After the 10 day period, the Reviewing Officer Recommendation and the respondents' written response, if any, will be circulated to the Commission to make a final determination.

Attachment

13092683908



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 11, 2013

**REVIEWING OFFICER RECOMMENDATION  
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 2598 – Susan Adams for Congress and Tamara S. Hull, in her official capacity as Treasurer  
(C00497222)

**Summary of Recommendation**

Make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a \$250 civil money penalty.

**Reason-to-Believe Background**

On December 4, 2012, the Commission found reason to believe ("RTB") that the respondents violated 2 U.S.C. § 434(a) for failing to timely file the 2012 October Quarterly Report and made a preliminary determination that the civil money penalty was \$2,970 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on December 5, 2012 to notify them of the Commission's RTB finding and civil money penalty.

**Legal Requirements**

The Federal Election Campaign Act ("Act") states that the treasurer of a principal campaign committee of a candidate shall file a report for the period ending September 30 no later than October 15. 2 U.S.C. § 434(a)(2)(A)(iii) and 11 C.F.R. § 104.5(a)(1)(i). Reports electronically filed must be received and validated at or before 11:59 pm Eastern Standard/Daylight Time on October 15 to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

**Respondents' Challenge**

On January 14, 2013, the Commission received the written response ("challenge") from the Treasurer challenging the RTB finding based on an incorrect level of activity. The Treasurer contends she mistakenly did not check the termination report box on their previous report; yet the campaign is closed, and the Committee's bank account only remains open because a contributor has not yet cashed a refund check.

The Treasurer states she will file the report if necessary and mentions needing help with FECFile since the Committee's NGP-VAN account is now closed. She indicates the activity for the reporting period consists of the receipt and refund of an erroneous \$25 automatic donation and a \$206.37 partial loan repayment to the Candidate. The Treasurer also mentions she was an unpaid volunteer and will have to personally pay the fine. Included with the challenge was a copy of the RTB Letter.

## Analysis

The respondents state that they mistakenly did not check the termination report box on their previous report, and the campaign is closed. A committee's filing obligation ends only upon filing a termination report pursuant to 11 C.F.R. § 102.3 and receiving written notification from the Commission that their termination report has been accepted. Until then, a committee must continue to file reports.

Although the Treasurer assumed the Committee had no further filing obligations, the Commission notified the respondents on two occasions that they had failed to file the October Quarterly Report. On October 16, 2012, the Electronic Filing Office (EFO) sent a notice to tamarahull@yahoo.com, and on October 31, 2012, the Commission sent a non-filer notice to their address of record. Upon receipt of the challenge, the Reviewing Officer contacted the Treasurer to confirm the Committee was required to file the report and offered Commission technical support.

At the time of the RTB finding, the Commission used an estimated level of activity (\$67,391) to calculate the fine because the report had not yet been filed. 11 C.F.R. § 111.43(d)(2)(i). On February 10, 2013, the Commission received the respondents' October Quarterly Report which discloses \$25.00 in total receipts and \$231.37 in total disbursements, resulting in an actual level of activity of \$256.37. Therefore, using the schedule of penalties at 11 C.F.R. § 111.43(a), for respondents with no previous violations, and the level of activity bracket of \$1 - \$4,999.99, the civil money penalty is  $250 \times [1 + (.25 \times 0)]$  or \$250, reduced from the RTB civil money penalty of \$2,970.

While the Reviewing Officer is sympathetic that the Treasurer is an unpaid volunteer, the position of treasurer is personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d). Their challenge fails to address any of the three valid grounds at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a \$250 civil money penalty.

## OAR Recommendations

- 1) Adopt the Reviewing Officer recommendation for AF# 2598 involving Susan Adams for Congress and Tamara S. Hull, in her official capacity as Treasurer, in making the final determination;
- 2) Make a final determination in AF# 2598 that Susan Adams for Congress and Tamara S. Hull, in her official capacity as Treasurer, violated 2 U.S.C. § 434(a) and, based on the actual level of activity disclosed on the October Quarterly Report (\$256.37), assess a \$250 civil money penalty (reduced from the RTB civil money penalty of \$2,970); and
- 3) Send the appropriate letter.

Acting Reviewing Officer: Rhiannon Magruder

Attachments



## **Attachments**

**Attachment 1 – Challenge Received from Respondents**

**Attachment 2 –**

**Attachment 3 – Declaration from RAD**

**Attachment 4 – Declaration from OAR**

13092683911

**DECLARATION OF RHIANNON MAGRUDER**

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) The 2012 October Quarterly Report, covering the period July 1 through September 30, is due October 15, 2012. If electronically filed, it must be received and validated by the Commission at or before 11:59 p.m., Eastern Standard/Daylight Time on October 15 to be timely filed.
- 3) It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the administrative fine regulations, including due dates of reports and filing requirements.
- 4) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
  - a) The Summary Page and Detailed Summary Pages for the 2012 October Quarterly Report, electronically filed by Susan Adams for Congress and Tamara S. Hull, in official capacity as Treasurer. According to the Commission's records, the report covers the period from July 1 through September 30, 2012, and was received on February 10, 2013. Line 16 lists \$25.00 in total receipts for the period. Line 22 lists \$231.37 in total disbursements for the period.
- 5) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 11<sup>th</sup> day of February, 2013.



Rhiannon Magruder  
Acting Reviewing Officer  
Office of Administrative Review  
Federal Election Commission

FEC Form 3 (Revised 02/2003)

# SUMMARY PAGE

## of Receipts and Disbursements

PAGE 2 / 6

Write or Type Committee Name

Susan Adams for Congress

Report Covering the Period:

From:

07 01 2012

To:

09 30 2012

	COLUMN A This Period			COLUMN B Election Cycle-to-Date		
6. Net Contributions (other than loans)						
(a) Total Contributions (other than loans) (from Line 11(e)) ....	,	,	25.00	,	,	202302.01
(b) Total Contribution Refunds (from Line 20(d)) .....	,	,	25.00	,	,	1050.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a)) .....	,	,	0.00	,	,	201252.01
7. Net Operating Expenditures						
(a) Total Operating Expenditures (from Line 17) .....	,	,	0.00	,	,	200895.64
(b) Total Offsets to Operating Expenditures (from Line 14) .....	,	,	0.00	,	,	0.00
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a)) .....	,	,	0.00	,	,	200895.64
8. Cash on Hand at Close of Reporting Period (from Line 27) .....	,	,	0.00			
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D) .....	,	,	0.00			
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D) .....	,	,	529.61			

For further information contact:

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100

# **DETAILED SUMMARY PAGE** of Receipts

PAGE 3 / 6

FEC Form 3 (Revised 12/2003)

Write or Type Committee Name

Susan Adams for Congress

Report Covering the Period:

From:

A M D Y Y Y Y  
07 01 2012

To:

M M D Y Y Y Y  
09 30 2012**I. RECEIPTS****COLUMN A**  
Total This Period**COLUMN B**  
Election Cycle-to-Date**11. CONTRIBUTIONS (other than loans) FROM:****(a) Individuals/Persons Other Than Political Committees**

(i) Itemized (use Schedule A) .....

0.00

185368.00

(ii) Unitemized .....

25.00

25.00

(iii) TOTAL of contributions  
from individuals .....

25.00

185393.00

(b) Political Party Committees .....

0.00

4.01

(c) Other Political Committees  
(such as PACs) .....

0.00

14035.00

(d) The Candidate .....

0.00

2870.00

**(e) TOTAL CONTRIBUTIONS**

(other than loans)

(add Lines 11(a)(ii), (b), (c), and (d)) ..

25.00

202302.01

**12. TRANSFERS FROM OTHER**

AUTHORIZED COMMITTEES .....

0.00

0.00

**13. LOANS:****(a) Made or Guaranteed by the**

Candidate .....

0.00

0.00

(b) All Other Loans .....

0.00

0.00

**(c) TOTAL LOANS**

(add Lines 13(a) and (b)) .....

0.00

0.00

**14. OFFSETS TO OPERATING**

EXPENDITURES

(Refunds, Rebates, etc.) .....

0.00

0.00

**15. OTHER RECEIPTS**

(Dividends, Interest, etc.) .....

0.00

0.00

**16. TOTAL RECEIPTS (add Lines**

11(e), 12, 13(c), 14, and 15)

(Carry Total to Line 24, page 4) .....

25.00

202302.01

13092683914

# **DETAILED SUMMARY PAGE** of Disbursements

FEC Form 3 (Revised 02/2003)

PAGE 4 / 6

II. DISBURSEMENTS	COLUMN A Total This Period		COLUMN B Election Cycle-to-Date	
17. OPERATING EXPENDITURES.....	,	,	0.00	200895.64
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES .....	,	,	0.00	0.00
19. LOAN REPAYMENTS:				
(a) Of Loans Made or Guaranteed by the Candidate.....	,	,	0.00	0.00
(b) Of All Other Loans .....	,	,	0.00	0.00
(c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and (b)).....	,	,	0.00	0.00
20. REFUNDS OF CONTRIBUTIONS TO:				
(a) Individuals/Persons Other Than Political Committees .....	,	,	25.00	50.00
(b) Political Party Committees.....	,	,	0.00	0.00
(c) Other Political Committees (such as PACs) .....	,	,	0.00	1000.00
(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b), and (c)).....	,	,	25.00	1050.00
21. OTHER DISBURSEMENTS .....	,	,	206.37	356.37
22. TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d), and 21) ►	,	,	231.37	202302.01

## **III. CASH SUMMARY**

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....	,	,	206.37
24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3).....	,	,	25.00
25. SUBTOTAL (add Line 23 and Line 24) .....	,	,	231.37
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....	,	,	231.37
27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (subtract Line 26 from Line 25).....	,	,	0.00



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**VIA OVERNIGHT DELIVERY**

February 13, 2013

Tamara S. Hull, in official capacity as Treasurer  
Susan Adams for Congress  
68 Mitchell Blvd., Suite 240  
San Rafael, CA 94903

C00497222  
AF#: 2598

Dear Ms. Hull:

On December 4, 2012, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Susan Adams for Congress and you, in your official capacity as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2012 October Quarterly Report. The Commission also made a preliminary determination that the civil money penalty was \$2,970 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing the written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination in this matter. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463. As a result of the anthrax threat in the Washington, DC area, US Postal Service mail delivery to federal agencies, including the Commission, has been interrupted. Until regular mail delivery resumes, you may also file your written response with the Commission Secretary via facsimile (202-208-3333) or by courier at the same address (if you use an overnight delivery service, please use zip code 20004 instead of zip code 20463). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Rhianon Magruder". The signature is written in a cursive, flowing style.

Rhianon Magruder  
Acting Reviewing Officer  
Office of Administrative Review

13092683916



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2013 FEB 27 AM 11: 14

February 27, 2013

MEMORANDUM

**SENSITIVE**

To: The Commission

Through: Alec Palmer  
Staff Director

From: Patricia C. Orrock  
Chief Compliance Officer

Rhiannon Magruder  
Acting Reviewing Officer  
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 2598 – Susan Adams for Congress and Tamara S. Hull, in her official capacity as Treasurer (C00497222)

On December 4, 2012, the Commission found reason to believe ("RTB") that the respondents violated 2 U.S.C. § 434(a) for failing to file the 2012 October Quarterly Report and made a preliminary determination that the civil money penalty was \$2,970, based on the schedule of penalties at 11 C.F.R. § 111.43.

On January 14, 2013, the Commission received their written response ("challenge"). After reviewing the challenge, the Reviewing Officer's recommendation ("ROR") dated February 11, 2013 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that they violated 2 U.S.C. § 434(a) and based on the actual level of activity disclosed for the October Quarterly reporting period (\$256.37), assess a \$250 civil money penalty (reduced from the RTB civil money penalty of \$2,970) because they submitted no evidence that a factual error was made in the RTB finding, that the penalty was miscalculated at RTB or that they used best efforts to file on time. 11 C.F.R. § 111.35(b).

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). As of this date, a written response has not been received.

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**OAR Recommendations**

- (1) Adopt the Reviewing Officer recommendation for AF# 2598 involving Susan Adams for Congress and Tamara S. Hull, in her official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 2598 that Susan Adams for Congress and Tamara S. Hull, in her official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$250; and
- (3) Send the appropriate letter.

13092683918



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Final Determination Recommendation: ) AF 2598  
Susan Adams for Congress and Tamara )  
S. Hull, in her official capacity as )  
Treasurer (C00497222) )

CERTIFICATION

I, Shelley E. Garr, Deputy Secretary of the Federal Election Commission,  
do hereby certify that on March 15, 2013, the Commission decided by a vote of  
4-0 to take the following actions in AF# 2598:

1. Adopt the Reviewing Officer recommendation for AF# 2598  
involving Susan Adams for Congress and Tamara S. Hull, in her  
official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 2598 that Susan Adams for  
Congress and Tamara S. Hull, in her official capacity as Treasurer,  
violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$250.
3. Send the appropriate letter.

Commissioners Hunter, McGahn II, Petersen, and Walther voted  
affirmatively for the decision. Commissioner Weintraub did not vote.

Attest:

March 15, 2013  
Date

Shelley E. Garr  
Shelley E. Garr  
Deputy Secretary of the Commission

13092683919



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 22, 2013

**VIA OVERNIGHT DELIVERY**

Tamara S. Hull, in official capacity as Treasurer  
Susan Adams for Congress  
68 Mitchell Blvd., Suite 240  
San Rafael, CA 94903

C00497222  
AF#: 2598

Dear Ms. Hull:

On December 4, 2012, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Susan Adams for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) for failing to file the 2012 October Quarterly Report. By letter dated December 5, 2012, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$2,970 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On January 14, 2013, the Office of Administrative Review received your written response, challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and the written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that Susan Adams for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) and based on the actual level of activity disclosed on the 2012 October Quarterly Report filed February 10, 2013 (\$256.37), assess a civil money penalty in the amount of \$250 in accordance with 11 C.F.R. § 111.43. The basis for the Reviewing Officer's recommendation was included in the Final Determination Report, a copy of which was sent to you on February 13, 2013.

On March 15, 2013, the Commission adopted the Reviewing Officer's recommendation and made a final determination that Susan Adams for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assessed a civil money penalty of \$250. It is based on the same factors used to calculate the civil money penalty at RTB. A copy of the final determination recommendation is attached.

**If You Choose to Appeal the Final Determination and/or Civil Money Penalty**

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the district court of the United States for the district in

13092683920

which the committee or treasurer reside, or transact business, requesting that the final determination be modified or set aside. See 2 U.S.C. § 437g(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 2 U.S.C. § 437g. 11 C.F.R. § 111.38.

#### **If You Choose Not to Pay the Civil Money Penalty and Not to Appeal**

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 et seq. If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact the debtor and request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services, and 30% on debts over two years old. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA").

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

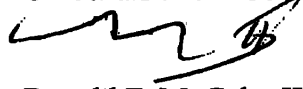
#### **If You Choose To Pay the Civil Money Penalty**

If you should decide to pay the civil money penalty, send the enclosed form and payment to the address on page 3 within 30 days of receipt of this letter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within 30 days from the date of the Commission's notification, this could occur at any time following certification of the Commission's vote.

If you have any questions regarding the payment of the civil money penalty, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

  
Donald F. McGahn II  
Vice Chairman

Attachment

-----  
**ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the civil money penalty is \$250 for the 2012 October Quarterly Report.

This penalty should be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission  
PO Box 979058  
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC # 979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The form and payment are due within 30 days of receipt of this letter.

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**  
-----

FOR: Susan Adams for Congress

FEC ID#: C00497222

AF#: 2598

PAYMENT AMOUNT DUE: \$250

FOR: Susan Adams for Congress

FEC ID#: C00497222

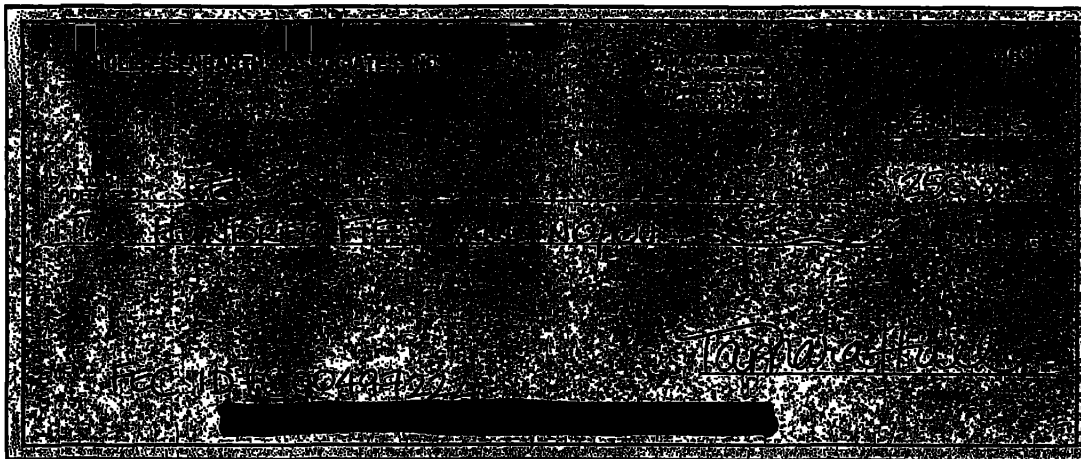
AF#: 2598

PAYMENT AMOUNT DUE: \$250

3

FEDERAL ELECTION COMMISSION

Lockbox: GLX-979058 Ledger Date 04/26/2013



Batch	Item	TID	Batch Total	Amount
1	1	Y-3009695	\$250.00	\$250.00

usbank.

St. Louis GA Lockbox  
(314) 425-1818

13092683923



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2598

DATE SCANNED 5-25-13

SCANNER NO. 2

SCAN OPERATOR AmH

13092683924